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May 9, 2022

VIA ECF

Hon. Pamela K. Chen, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: IME Watchdog, Inc. v. Safa Gelardi, et al.
Civil No. 1:22-cv-1032 (PKC-JRC)

Dear Judge Chen:

We represent Defendants/Counterclaim Plaintiffs and Third-Party Plaintiffs Safa Gelardi, Vito Gelardi, and IME Companions (collectively, “Companions”) in the above-referenced matter. I have spoken to Plaintiffs’ counsel regarding Companions’ request for entry of default, filed today. I have agreed to withdraw this filing on the basis that the Court’s rules permit a pre-motion conference request for a motion to dismiss to have the same effect as the filing of the motion itself.

Thank you for your time and attention to this matter.

Respectfully submitted,

By: /s/ Steven Siegler
Steven Siegler, Esq.

cc: Emanuel Kataev, Esq. (via ECF and Electronic Mail)
Leo Shalit, Esq. (via ECF and Electronic Mail)